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October 25, 2024

**Via PACER/ECF**

The Honorable Michael A. Shipp, U.S.D.J.  
The Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices  
and Product Liability Litig., Case No. 3:16-md-2738 (MAS)/(RLS)***

Dear Judge Shipp and Judge Singh:

We represent Beasley Allen and Andy D. Birchfield, Jr., Esq. (together "Beasley Allen") regarding the pending Motion to Remove Beasley Allen ("Motion") from the Plaintiffs' Steering Committee ("PSC"). ECF No. 33290. By Text Order at 9:30 a.m. yesterday, this Court directed that the schedule requested by counsel and granted by Judge Singh (ECF 33334) is to be complied with. Several hours after this Text Order was entered, however, Judge Lopez (Bankruptcy Judge overseeing the Red River Talc litigation, expressly Ordered at 1:00 PM that the bankruptcy stay applies here:

"The Court supplements the October 21, 2024 ruling to state that the stay also extends to any action by Johnson & Johnson or any other entity to disqualify any counsel in any case."

Case 24-01394, Docket #48

This Text Order was then formally entered into an Order by Judge Lopez at Docket No. 57, page 7, page 6 (attached for the Court's convenience as **Ex A.**).

In light of this recent direction from Judge Lopez, we write to seek the Court's agreement that no further filings are to be made in ECF No. 333290 regarding Johnson & Johnson's motion to



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remove Beasley Allen from the Plaintiffs Steering Committee unless and until the Red River Talc litigation stay is removed or, alternatively, we receive a further Order from this Court.

Respectfully submitted,

/s/ Jeffrey M. Pollock

JEFFREY M. POLLOCK

cc: All Counsel (*via* ECF)

**In light of Judge Lopez's Order finding that the stay imposed by the United States Bankruptcy Court for the Southern District of Texas shall "apply to all activity . . . including the pending motion to disqualify, and to remove from the Executive Committee, the Beasley Allen firm in the federal MDL" (ECF No. 33402-1), this Court will stay the briefing schedule for Defendants' Motions (ECF Nos. 28760 & 33290) until the litigation stay has been removed. The Clerk's office shall administratively terminate ECF Nos. 28760 and 33290. Counsel may e-file a letter request to reinstate the motions once the litigation stay has been removed.**

A handwritten signature in black ink, appearing to read "M. Shipp", written over a horizontal line.

MICHAEL A. SHIPP  
UNITED STATES DISTRICT JUDGE

Dated: 10/28/2024